

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 2:21-cr-00089-SDM

JAMES V. BARLOW, et al.,

Defendants.

MOTION TO AMEND PRETRIAL RELEASE CONDITIONS

Now comes Defendant James V. Barlow, by and through undersigned counsel, and respectfully moves the Court to amend Mr. James Barlow's pre-trial release conditions.

At the change of plea hearing on November 23, 2021, Your Honor granted Mr. Barlow release pending sentencing with release conditions, *See ECF 82*. Condition 9(i) includes a travel restriction limiting Mr. Barlow to Nevada and the Southern District of Ohio for Court purposes only. At the time of that order, this Court allowed Mr. Barlow to travel to Utah for Thanksgiving with clear travel dates and return dates. Mr. Barlow seeks a similar exemption for two travel purposes as follows:

1. Travel to Utah for the purpose of spending Christmas with family.
 - a. The specifics of this travel include:

- i. Travelling by auto to Utah leaving Nevada on December 21, 2021 and to return to Nevada no later than December 28, 2021.
2. Travel to Colorado to pick up a vehicle and to drive it back to Nevada.
 - a. The specifics of this travel include:
 - i. Travelling to Colorado by plane on January 6, 2022, to return by driving the vehicle back to Nevada no later than January 13, 2022.

Counsel for Mr. Barlow has spoken with Mr. Hunter for the government, who does not oppose these requests. Counsel has also spoken with Mr. Barlow's pretrial officers (in both Nevada and Ohio) who also would not oppose these requests.

For all of these reasons, Mr. Barlow respectfully asks the Court to amend his release conditions as requested.

Respectfully submitted,

/s/ Christopher Mishler

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CERTIFICATE OF SERVICE

The Undersigned hereby certifies that a copy of the foregoing Motion was served upon Mike Hunter, Esq., attorney for Plaintiff, by email on this 20th day of December, 2021.

/s/ Christopher Mishler
Christopher Mishler (14402)